

# EXHIBIT E

1                   UNITED STATES DISTRICT COURT  
2                   DISTRICT OF MINNESOTA

3 PRO-LIFE ACTION MINISTRIES,                   Case No. 23-CV-00853  
4 LUCY MALONEY, THOMAS WILKIN,                   (ECT/DJF)  
and DEBRA BRAUN,

5                   Plaintiffs,

6                   vs.

7 CITY OF MINNEAPOLIS, a  
8 Minnesota municipality,

9                   Defendant.  
10

11                  The VIDEOTAPED DEPOSITION of LISA R. GOODMAN,  
12 taken pursuant to Notice of Taking Deposition, at  
13 150 South Fifth Street, Suite 3100, Minneapolis,  
14 Minnesota, before Gail M. Hinrichs, Registered  
15 Professional Reporter and Notary Public, taken on the  
16 27th day of August, 2024, commencing at approximately  
17 10:06 a.m.

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## 1 A P P E A R A N C E S

2 APPEARING FOR THE PLAINTIFFS:

3 B. TYLER BROOKS, ESQUIRE  
4 NATHAN LOYD, ESQUIRE  
5 THOMAS MORE SOCIETY  
6 309 West Washington Street  
7 Suite 1250  
Chicago, Illinois 606068  
9 email: tbrooks@thomasmoresociety.org  
nloyd@thomasmoresociety.org

10 APPEARING FOR THE DEFENDANT:

11 TRACEY FUSSY, ESQUIRE  
12 SARA LATHROP, ESQUIRE  
13 MUNAZZA HUMAYUN, ESQUIRE  
14 CITY OF MINNEAPOLIS ATTORNEY'S OFFICE  
15 105 Fifth Avenue South  
Suite 200  
Minneapolis, Minnesota 5540116  
17 email: Tracey.Fussy@minneapolismn.gov  
Sara.Lathrop@minneapolismn.gov  
Munazza.Humayun@minneapolismn.gov18  
19 ALSO PRESENT: Brian Gibson and Debra Braun, Plaintiffs  
Adam Wallin, Video Operator20  
21 \*The Original is in the possession of  
22 Attorney B. Tyler Brooks.\*23  
24 \* \* \*  
25

1 VIDEO OPERATOR: We are on the  
2 record. This is the video recorded deposition of  
3 Lisa R. Goodman, taken on August 27, 2024. The time  
4 now is 10:06 a.m. This deposition is being taken in  
5 the matter of Pro-Life Action Ministries, Lucy  
6 Malone, Thomas Wilkin and Debra Braun versus the  
7 City of Minneapolis, United States District Court,  
8 District of Minnesota, case number 23-CV-00853,  
9 ECT/DJF.

10                   This deposition is taking place in  
11         Minneapolis, Minnesota. My name is Adam Wallin.  
12         I'm the videographer representing Kirby Kennedy and  
13         Associates.

16 MR. BROOKS: Yes. This is Tyler  
17 Brooks, counsel for the plaintiffs.

18 MR. LOYD: This is Nathan Loyd,  
19 counsel for the plaintiffs.

20 MS. LATHROP: My name is Sara  
21 Lathrop, I'm an assistant city attorney, I'm an  
22 attorney for the defendant.

23 MS. FUSSY: Tracey Fussy for the  
24 defendant.

MS. HUMAYUN: Munazza Humayun for

1 the defendant.

2 VIDEO OPERATOR: Will the court  
3 reporter please swear in the witness.

4 LISA R. GOODMAN,  
5 after having been duly sworn, was examined and  
6 testified on her oath as follows:

7

8 EXAMINATION

9 BY MR. BROOKS:

10 Q Well, good morning, Ms. Goodman. I'll  
11 ask the first question, would you like me to refer  
12 to you as Ms. Goodman or Council Member Goodman?  
13 Which do you prefer? I'll do whichever.

14 A Ms. Goodman is good. You can refer to me  
15 as Lisa as well if you like.

16 Q Oh, I don't want to do that, but if I do  
17 refer to you as Council Member Goodman --

18 A It's okay. I respond to that also.

19 Q Okay. If I do that, I'm not trying to  
20 imply that you are currently a member of the city  
21 council. I'm just --

22 A It's an honorary term. I think it might  
23 be okay.

24 Q Okay. Quickly, have you ever been  
25 deposed before?

1       chiefs. So I don't even remember who it even was,  
2 more or less who I would or would not have reached  
3 out to.

4           Q     Okay. And then there's this email, the  
5 last one, is Timothy Stanley to you, October 26, the  
6 same day, just a little later in the afternoon. It  
7 says: Lisa, I hate to say this, but this is the  
8 bureaucratic/protect my fiefdom b.s. that has always  
9 prevented us from moving an ordinance in either city  
10 hall. I'm going to stop there.

11                  Does either city hall, is that a term of  
12 art in the Twin Cities to mean Minneapolis and Saint  
13 Paul?

14                  MS. HUMAYUN: Objection to the  
15 extent it calls for speculation.

16                  THE WITNESS: I don't know. That's  
17 a good analysis, but I don't know.

18 BY MR. BROOKS:

19            Q     Okay. I just didn't know if, since I am  
20 not from here, if that's a way to refer to the Twin  
21 Cities.

22                  So you don't know what he means then by  
23 "either city hall"?

24            A     I don't.

25            Q     Okay. He says: I tire of the big talk.

1 As I told you earlier, we've needed to do this for  
2 years, even though all we're doing is reiterating  
3 the FACE Act and asking permission to paint the  
4 sidewalk, but our bandwidth is stretched and we need  
5 to maximize impact. Keep the pressure on and let me  
6 know how I can help.

7 Going to the FACE Act, do you recall  
8 looking at a document earlier that I said was the  
9 FACE Act?

10 A The Freedom of Access to Clinic Act?

11 Q Yes.

12 A Did you show me a copy of that before?

13 Q I did.

14 A Okay. And what was the question?

15 Q I was asking if you recall that I did  
16 that.

17 A Apparently not.

18 Q Okay. That doesn't matter and I'll  
19 rephrase the question.

20 A Sorry.

21 Q When he referred to the FACE Act here,  
22 did you know what he was referring to?

23 A I don't think so, but I'm not sure. I  
24 might have at the time, but I don't recall now.

25 Q Okay. So you wouldn't know whether the

1 ordinance as it was crafted on October 26 was simply  
2 reiterating the FACE Act or not?

3 A No.

4 Q Okay. I'm going to -- this one should be  
5 simple --

6 A Is this one done?

7 Q Yes, ma'am. Hopefully this will be  
8 simple, MPLS 001290.

9 (Whereupon Exhibit 18 was marked for  
10 identification.)

11 BY MR. BROOKS:

12 Q Does this look familiar to you?

13 A Yes and no. I mean I've seen lots of  
14 presentations and that kind of thing, and that's  
15 what this is.

16 Q Okay. If you recall, and I don't want  
17 you to speculate, if you recall, was this  
18 presentation made at the city council meeting where  
19 the ordinance was voted on?

20 A I'm going to say probably because there's  
21 always a staff presentation before a public hearing.  
22 So this is likely what that was. I believe the  
23 public hearing was on November 9. Am I wrong about  
24 that?

25 Q I think that's correct.